

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA.

Plaintiff,

v.

RYAN BACON,

Defendant.

Criminal Action No. 05-

93

REDACTED

INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNT ONE

On or about September 7, 2005, in or near Wilmington, in the State and District of Delaware, Ryan Bacon, Defendant herein, did knowingly possess in and affecting interstate and foreign commerce, a firearm, that is, a Standard Arms of Nevada, Inc. 9 mm pistol, model SA-9, Serial Number 01451, and a Taurus .38 caliber revolver, Serial Number UI34528, after having been convicted on or about June 14, 2005, of a crime punishable by imprisonment for a term exceeding one year, in the Superior Court in and for New Castle County, Delaware, in violation of Title 18, United States Code, Sections 922(g)(1) & 924(a)(2).

COUNT TWO

On or about September 7, 2005, in or near Wilmington, in the State and District of Delaware, Ryan Bacon, Defendant herein, did knowingly possess with intent to distribute a substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).



**COUNT THREE**

On or about September 7, 2005, in or near Wilmington, in the State and District of Delaware, Ryan Bacon, Defendant herein, during in and in relation to a drug trafficking crime, to wit, possession with intent to distribute heroin, in violation of Title 21, United States Code, Section 841(a)(1) & (b)(1)(C), as alleged in Count Two of the Indictment, incorporated by reference herein, did knowingly carry a firearm, to wit, a Standard Arms of Nevada, Inc. 9 mm pistol, model SA-9, Serial Number 01451, and a Taurus .38 caliber revolver, Serial Number UI34528, in violation of Title 18, United States Code, Sections 924(c)(1) & (2).

A TRUE BILL:

For person \_\_\_\_\_

COLM F. CONNOLLY  
UNITED STATES ATTORNEY

By: Christopher J. Burke  
Christopher J. Burke  
Assistant United States Attorney

Dated: October 25, 2005

Copy \_\_\_\_\_  
Date \_\_\_\_\_  
to the Indictment  
Indictment, upon which  
been presented, and  
Dated this \_\_\_\_\_ 2005